



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
McLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wileyrein.com

February 4, 2011

Michael A. Lewis  
202.719.7338  
mlewis@wileyrein.com

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Presentation  
WT Docket No. 07-293; IB Docket No. 95-91

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on February 3, 2011, representatives from Sirius XM Radio Inc. ("Sirius XM") spoke with staff from the Office of Engineering and Technology ("OET") and the Wireless Telecommunications Bureau ("WTB") on issues associated with the above-captioned proceedings. Participating in these discussions were Terrence Smith, Craig Wadin, and James Blitz from Sirius XM, and myself. We spoke with Julius Knapp, Ron Repasi, and Pat Forster from OET, and Roger Noel, Thomas Derenge, and Paul Moon from WTB.

During the meeting, Sirius XM presented the staff with information documenting the company's efforts to benchmark the current availability of satellite radio service across the country. Collecting such data at this point in time will help the parties assess the degree of any service degradation that may result from new WCS operations and will therefore facilitate the coordination efforts required between Sirius XM and WCS licensees. The attached slides were provided to help explain the procedures used to collect this information.

Please let me know if there are any questions about this submission.

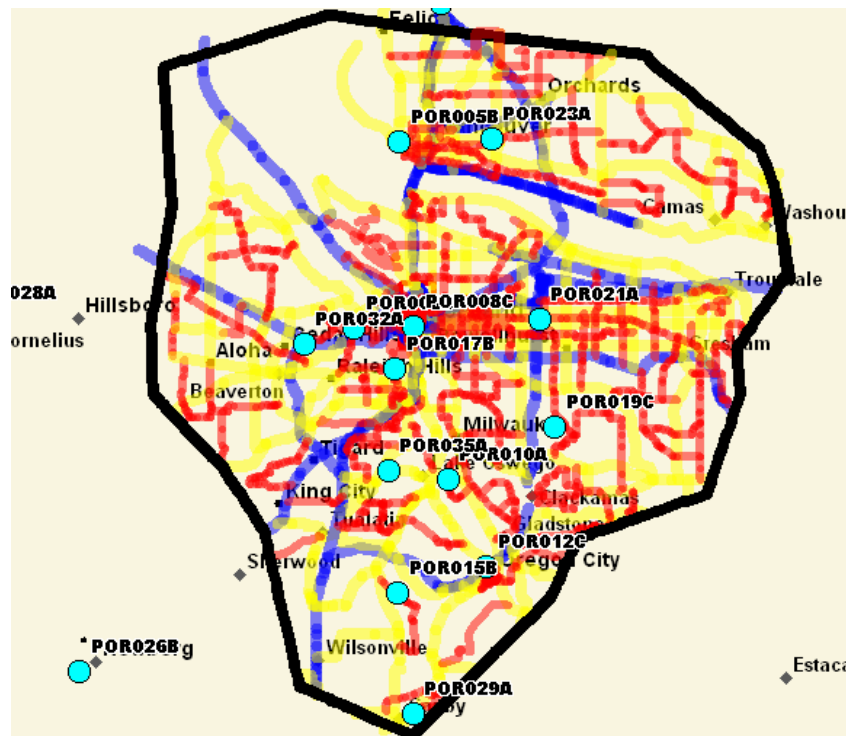
Sincerely,

/s/ Michael A. Lewis  
Michael A. Lewis  
Engineering Consultant  
Wiley Rein LLP  
*Counsel for Sirius XM Radio Inc.*

cc: FCC Meeting Participants

# Interference identification process

- Sirius XM is currently conducting critical tests to baseline the QoS of the satellite radio system and interference conditions prior to the initiation of the new services in the WCS band using the new rules.
- Results will be used to identify the problematic future interference conditions
  - Tests are done in and around selected satellite radio markets. Operational conditions are measured satellite-only and three-stream areas as illustrated in the following Portland, OR example, where different colors show various test locations or routes.



SIRIUS XM Confidential

## ➤ Deliverables from the interference tests

- Test setup, and static or mobile test locations
- Interference logs containing various statistics including the satellite radio mute events or Code Word Error Rate (WER) with position- and time-tags
- Available interferer description including uplink and downlink power and activity levels, and other descriptive information
- Analysis showing potential impact over the CONUS

# Interference identification process (Continued)

- **Coordination based on a maximum allowable degradation of the overall SDARS QoS**
  - Aggregate up and downlink interference should be measured
  - Interference criteria is the increase of mutes or WER by a factor of two in a base station coverage area (vs. the baseline that was taken from the same or a similar market)
- **Following figures illustrate the before and after interference conditions with new rules that trigger a coordination activity with an example from the Philadelphia, PA area**

